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June 13, 2025

BY ECF

Hon. Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Birch, 23 CR 563 (LAK) (SDNY)

Dear Judge Kaplan:

I am writing on behalf of defendant Robert Birch and without objection from the government to inform the Court that the parties have reached a disposition in this case and respectfully request that Tuesday's status hearing be adjourned to December for the defendant's sentencing, which I am informed by Your Honor's Courtroom Deputy is when it will likely occur should Mr. Birch's change of plea hearing be scheduled for mid-July before a magistrate. We will need the next few weeks to receive the plea agreement from the government and to review it with the defendant.

Additionally, the defendant consents to the exclusion of time under the Speedy Trial Act between June 17, 2025 and his change of plea hearing, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Jamie Bagliebter, Esq.
Elizabeth Espinosa, Esq.

Assistant United States Attorneys (by ECF and email)